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7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
10

11 JANE DOE,

12 Plaintiff,

13 v.

14 COUNTY OF LOS ANGELES, a  
municipal entity; AARON TANNER,  
15 an individual, DOES 1-100 inclusive,

16 Defendants.

Case No. 2:24-cv-08649-SPG(SKx)

**DEFENDANT COUNTY OF LOS  
ANGELES' ANSWER TO  
PLAINTIFF JANE DOE'S FIRST  
AMENDED COMPLAINT;  
DEMAND FOR JURY TRIAL**

[Assigned to Hon. Sherilyn Peace  
Garnett, Courtroom "5C"]

17  
18 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

19 Defendant, COUNTY OF LOS ANGELES ("Defendant"), for itself alone,  
20 hereby answer Plaintiff, JANE DOE'S ("Plaintiff") First Amended Complaint in this  
21 matter (the "Complaint"), as follows:

22 **SUMMARY OF ALLEGATIONS**

23 1. In answer to paragraph 1, Defendant admits that it is a government  
24 agency and is located in the County of Los Angeles, California. Defendant also admits  
25 that the Los Angeles County Sheriff Department is a branch of the County of Los  
26 Angeles.

27 2. In answer to paragraph 2, Defendant is without sufficient knowledge or  
28 information to form a belief as to the truth of the allegations in paragraph 2, and on

1 that basis, denies each and every allegation therein.

2 3. In answer to paragraph 3, Defendant denies each and every allegation  
3 stated therein.

4 4. In answer to paragraph 4, Defendant is without sufficient knowledge or  
5 information to form a belief as to the truth of the allegations in paragraph 4, and on  
6 that basis, denies each and every allegation therein.

7 5. In answer to paragraph 5, Defendant denies each and every allegation  
8 stated therein.

9 6. In answer to paragraph 6, Defendant is without sufficient knowledge or  
10 information to form a belief as to the truth of the allegations in paragraph 6, and on  
11 that basis, denies each and every allegation therein.

12 7. In answer to paragraph 7, Defendant is without sufficient knowledge or  
13 information to form a belief as to the truth of the allegations in paragraph 7, and on  
14 that basis, denies each and every allegation therein.

15 8. In answer to paragraph 8, Defendant denies each and every allegation  
16 stated therein.

17 9. In answer to paragraph 9, Defendant is without sufficient knowledge or  
18 information to form a belief as to the truth of the allegations in paragraph 9, and on  
19 that basis, denies each and every allegation therein.

20 10. In answer to paragraph 10, Defendant denies each and every allegation  
21 stated therein.

22 11. In answer to paragraph 11, Defendant is without sufficient knowledge or  
23 information to form a belief as to the truth of the allegations in paragraph 11, and on  
24 that basis, denies each and every allegation therein.

25 12. In answer to paragraph 12, Defendant denies each and every allegation  
26 stated therein.

27 13. In answer to paragraph 13, Defendant is without sufficient knowledge or  
28 information to form a belief as to the truth of the allegations in paragraph 13, and on

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1 that basis, denies each and every allegation therein.

2 14. In answer to paragraph 14, Defendant is without sufficient knowledge or  
3 information to form a belief as to the truth of the allegations in paragraph 14, and on  
4 that basis, denies each and every allegation therein.

5 15. In answer to paragraph 15, Defendant is without sufficient knowledge or  
6 information to form a belief as to the truth of the allegations in paragraph 15, and on  
7 that basis, denies each and every allegation therein.

8 16. In answer to paragraph 16, Defendant is without sufficient knowledge or  
9 information to form a belief as to the truth of the allegations in paragraph 16, and on  
10 that basis, denies each and every allegation therein.

11 17. In answer to paragraph 17, Defendant is without sufficient knowledge  
12 or information to form a belief as to the truth of the allegations in paragraph 17, and  
13 on that basis, denies each and every allegation therein.

14 18. In answer to paragraph 18, Defendant is without sufficient knowledge or  
15 information to form a belief as to the truth of the allegations in paragraph 18, and on  
16 that basis, denies each and every allegation therein.

17 19. In answer to paragraph 19, Defendant denies each and every allegation  
18 stated therein.

19 20. In answer to paragraph 20, Defendant is without sufficient knowledge or  
20 information to form a belief as to the truth of the allegations in paragraph 20, and on  
21 that basis, denies each and every allegation therein.

22 21. In answer to paragraph 21, Defendant is without sufficient knowledge or  
23 information to form a belief as to the truth of the allegations in paragraph 21, and on  
24 that basis, denies each and every allegation therein.

25 22. In answer to paragraph 22, Defendant is without sufficient knowledge or  
26 information to form a belief as to the truth of the allegations in paragraph 22, and on  
27 that basis, denies each and every allegation therein.

28 23. In answer to paragraph 23, Defendant is without sufficient knowledge or

1 information to form a belief as to the truth of the allegations in paragraph 23, and on  
2 that basis, denies each and every allegation therein.

3 24. In answer to paragraph 24, Defendant is without sufficient knowledge or  
4 information to form a belief as to the truth of the allegations in paragraph 24, and on  
5 that basis, denies each and every allegation therein.

6 25. In answer to paragraph 25, Defendant is without sufficient knowledge or  
7 information to form a belief as to the truth of the allegations in paragraph 25, and on  
8 that basis, denies each and every allegation therein.

9 26. In answer to paragraph 26, Defendant is without sufficient knowledge or  
10 information to form a belief as to the truth of the allegations in paragraph 26, and on  
11 that basis, denies each and every allegation therein.

12 27. In answer to paragraph 27, Defendant is without sufficient knowledge or  
13 information to form a belief as to the truth of the allegations in paragraph 27, and on  
14 that basis, denies each and every allegation therein.

15 28. In answer to paragraph 28, Defendant is without sufficient knowledge or  
16 information to form a belief as to the truth of the allegations in paragraph 28, and on  
17 that basis, denies each and every allegation therein.

18 29. In answer to paragraph 29, Defendant is without sufficient knowledge or  
19 information to form a belief as to the truth of the allegations in paragraph 29, and on  
20 that basis, denies each and every allegation therein.

21 30. In answer to paragraph 30, Defendant is without sufficient knowledge or  
22 information to form a belief as to the truth of the allegations in paragraph 30, and on  
23 that basis, denies each and every allegation therein.

24 31. In answer to paragraph 31, Defendant denies each and every allegation  
25 stated therein.

26 32. In answer to paragraph 32, Defendant denies each and every allegation  
27 stated therein.

28 33. In answer to paragraph 33, Defendant denies each and every allegation

1 stated therein.

2 34. In answer to paragraph 34, Defendant denies each and every allegation  
3 stated therein.

4 35. In answer to paragraph 35, Defendant denies each and every allegation  
5 stated therein.

6 **FIRST CAUSE OF ACTION**

7 **Deprivation of Civil Rights Under 42 U.S.C. § 1983**

8 **(Against Defendants County of Angeles and Deputy Aaron Tanner)**

9 36. In answer to paragraph 36, Defendant acknowledges that Plaintiff is re-  
10 alleging her prior allegations and in response, Defendant repeats and realleges its  
11 answers to paragraphs 1–35 above.

12 37. In answer to paragraph 37, Defendant denies each and every allegation  
13 stated therein.

14 38. In answer to paragraph 38, Defendant is without sufficient knowledge or  
15 information to form a belief as to the truth of the allegations in paragraph 38, and on  
16 that basis, denies each and every allegation therein.

17 39. In answer to paragraph 39, Defendant denies each and every allegation  
18 stated therein.

19 40. In answer to paragraph 40, Defendant denies each and every allegation  
20 stated therein.

21 41. In answer to paragraph 41, Defendant denies each and every allegation  
22 stated therein.

23 42. In answer to paragraph 42, Defendant denies each and every allegation  
24 stated therein.

25 43. In answer to paragraph 43, Defendant denies each and every allegation  
26 stated therein.

27 44. In answer to paragraph 44, Defendant denies each and every allegation  
28 stated therein.

1           45. In answer to paragraph 45, Defendant is without sufficient knowledge or  
2 information to form a belief as to the truth of the allegations in paragraph 45, and on  
3 that basis, denies each and every allegation therein.

4           46. In answer to paragraph 46, Defendant denies each and every allegation  
5 stated therein.

6           47. In answer to paragraph 47, Defendant denies each and every allegation  
7 stated therein.

8           48. In answer to paragraph 48, Defendant denies each and every allegation  
9 stated therein.

10          49. In answer to paragraph 49, Defendant denies each and every allegation  
11 stated therein.

12          50. In answer to paragraph 50, Defendant denies each and every allegation  
13 stated therein.

14          51. In answer to paragraph 51, Defendant denies each and every allegation  
15 stated therein.

16          52. In answer to paragraph 52, Defendant is without sufficient knowledge or  
17 information to form a belief as to the truth of the allegations in paragraph 52, and on  
18 that basis, denies each and every allegation therein.

19                                   **SECOND CAUSE OF ACTION**

20                                   **Negligence**

21                   **(Against Defendants County of Angeles and Doe Defendants 1-100)**

22          53. In answer to paragraph 53, Defendant acknowledges that Plaintiff is re-  
23 alleging her prior allegations and in response, Defendant repeats and realleges its  
24 answers to paragraphs 1–52 above.

25          54. In answer to paragraph 54, Defendant denies each and every allegation  
26 stated therein.

27          55. In answer to paragraph 55, Defendant denies each and every allegation  
28 stated therein.

1           56. In answer to paragraph 56, Defendant denies each and every allegation  
2 stated therein.

3           57. In answer to paragraph 57, Defendant denies each and every allegation  
4 stated therein.

5           58. In answer to paragraph 58, Defendant denies each and every allegation  
6 stated therein.

7           59. In answer to paragraph 59, Defendant denies each and every allegation  
8 stated therein.

9           60. In answer to paragraph 60, Defendant denies each and every allegation  
10 stated therein.

11                                   **PRAYER FOR DAMAGES**

12           In answer to Plaintiff's Prayer for Relief, Paragraphs 1–7, Defendant denies  
13 generally and specifically each and every allegation contained herein as it refers to  
14 this answering Defendant, and further denies that Plaintiff is entitled to an award of  
15 damages, including punitive damages, equitable relief, or any other relief as a result  
16 of any act or omission by this answering Defendant.

17                                   **AFFIRMATIVE DEFENSES**

18           As separate and distinct affirmative defenses, Defendant alleges each of the  
19 following:

20                                   **FIRST AFFIRMATIVE DEFENSE**

21           As a separate and distinct affirmative defense, this answering Defendant alleges  
22 Plaintiff's Complaint fails to state facts sufficient to constitute a claim upon which  
23 relief can be granted.

24                                   **SECOND AFFIRMATIVE DEFENSE**

25           As a separate and distinct affirmative defense, this answering Defendant alleges  
26 Plaintiff failed to fully comply with the California Government Tort Claims Act.

27                                   **THIRD AFFIRMATIVE DEFENSE**

28           As a separate and distinct affirmative defense, this answering Defendant alleges



1 that Plaintiff's Complaint, and each claim contained therein, is barred because  
2 Defendant is not the cause-in-fact or substantial cause of any alleged damage, injury,  
3 or loss to Plaintiff, if any.

4 **FOURTH AFFIRMATIVE DEFENSE**

5 As a separate and distinct affirmative defense, this answering Defendant alleges  
6 Plaintiff's Complaint, and each claim contained therein, is barred pursuant to the  
7 doctrine of unclean hands.

8 **FIFTH AFFIRMATIVE DEFENSE**

9 As a separate and distinct affirmative defense, this answering Defendant alleges  
10 that Plaintiff lacks standing to pursue the claims alleged in her Complaint.

11 **SIXTH AFFIRMATIVE DEFENSE**

12 As a separate and distinct affirmative defense, this answering Defendant alleges  
13 that Plaintiff's Complaint, and each and every claim contained therein, and/or any  
14 amendments thereto, is barred by the applicable statute of limitations.

15 **SEVENTH AFFIRMATIVE DEFENSE**

16 As a separate and distinct affirmative defense, this answering Defendant alleges  
17 that Plaintiff's Complaint fails to state a claim under 42 U.S.C., section 1983, for  
18 Fourth, and Fourteenth Amendment violations upon which relief can be granted  
19 against Defendant.

20 **EIGHTH AFFIRMATIVE DEFENSE**

21 As a separate and distinct affirmative defense, this answering Defendant is  
22 protected from liability under the doctrine of qualified immunity.

23 **NINTH AFFIRMATIVE DEFENSE**

24 As a separate and distinct affirmative defense, this answering Defendant is not  
25 liable for alleged violations of civil or constitutional rights by non-policymakers.

26 **TENTH AFFIRMATIVE DEFENSE**

27 As a separate and distinct affirmative defense, this answering Defendant alleges  
28 Plaintiff's Complaint, and each claim contained therein, is barred pursuant to the



1 equitable doctrine of waiver.

2 **ELEVENTH AFFIRMATIVE DEFENSE**

3 As a separate and distinct affirmative defense, this answering Defendant alleges  
4 Plaintiff is estopped by her own acts or omissions from recovery against this  
5 answering Defendant for the claims asserted in the Complaint.

6 **TWELFTH AFFIRMATIVE DEFENSE**

7 As a separate and distinct affirmative defense, this answering Defendant alleges  
8 Plaintiff caused the injuries she alleges in the Complaint by her own negligence and  
9 omissions, and her own carelessness, negligence, and omissions were the proximate  
10 cause of the damage, if any, to Plaintiff.

11 **THIRTEENTH AFFIRMATIVE DEFENSE**

12 As a separate and distinct affirmative defense, this answering Defendant alleges  
13 Plaintiff's alleged damages, if any, as contained in the Complaint, were caused by  
14 persons and/or entities other than this answering Defendant, who failed to exercise  
15 ordinary care, caution, prudence, and were negligent, or acted wrongfully in its  
16 dealing with Plaintiff, and that at all times, said persons or entities were acting without  
17 consent, authorization, knowledge, and/or ratification of this answering Defendant.  
18 Accordingly, any recovery against this answering Defendant by Plaintiff must be  
19 precluded and/or reduced in a proportionate amount to the fault on the part of such  
20 other person(s) and/or entities.

21 **FOURTEENTH AFFIRMATIVE DEFENSE**

22 As a separate and distinct affirmative defense, this answering Defendant is not  
23 liable by operation of California Government Code, sections 815.2(b) and 820.4, for  
24 the execution or enforcement of the law by public officers exercising due care.

25 **FIFTEENTH AFFIRMATIVE DEFENSE**

26 As a separate and distinct affirmative defense, this answering Defendant alleges  
27 the conduct that is the subject of Plaintiff's Complaint, was absolutely and/or  
28 conditionally legally privileged, and/or justified. Further, all of the actions by this

1 answering Defendant was in good faith and reasonable.

2 **SIXTEENTH AFFIRMATIVE DEFENSE**

3 As a separate and distinct affirmative defense, this answering Defendant alleges  
4 it is immune from liability pursuant to the provisions of California Government Code,  
5 sections 815.2, 818, 818.8, 820.8, 821.8, 822.2 and 845.

6 **SEVENTEENTH AFFIRMATIVE DEFENSE**

7 As a separate and distinct affirmative defense, this answering Defendant alleges  
8 that, on or about the time, date, and place alleged in Plaintiff's Complaint, Plaintiff's  
9 conduct and/or the conduct of third persons or entities was of such nature as to  
10 constitute an independent, intervening, and superseding cause, which was the sole  
11 proximate cause of Plaintiff's alleged injuries and damages.

12 **EIGHTEENTH AFFIRMATIVE DEFENSE**

13 As a separate and distinct affirmative defense, this answering Defendant alleges  
14 that its acts or omissions were discretionary, requiring personal deliberation, decision,  
15 and judgment, which were done honestly, reasonably, and in good faith, and by virtue  
16 of which, this answering Defendant is immune from liability.

17 **NINETEENTH AFFIRMATIVE DEFENSE**

18 As a separate and distinct affirmative defense, this answering Defendant alleges  
19 that all the claims in Plaintiff's Complaint are barred because Plaintiff failed to take  
20 reasonable steps to mitigate her damages.

21 **TWENTIETH AFFIRMATIVE DEFENSE**

22 As a separate and distinct affirmative defense, this answering Defendant is  
23 shielded from liability for civil damages insofar as the conduct alleged in this case did  
24 not violate any reasonably known statutory or constitutional right.

25 **TWENTY-FIRST AFFIRMATIVE DEFENSE**

26 As a separate and distinct affirmative defense, this answering Defendant alleges  
27 Plaintiff's claims are barred because the alleged violation of civil rights did not occur  
28 pursuant to a governmental policy, custom, practice, or procedure.

**TWENTY-SECOND AFFIRMATIVE DEFENSE**

As a separate and distinct affirmative defense, this answering Defendant alleges Plaintiff's Complaint, and each claim contained therein, is barred by the doctrine of res judicata.

**TWENTY-THIRD AFFIRMATIVE DEFENSE**

As a separate and distinct affirmative defense, this answering Defendant alleges Plaintiff's action is barred by Plaintiff's failure to join, in a timely fashion, indispensable and/or necessary parties to this action.

**TWENTY-FOURTH AFFIRMATIVE DEFENSE**

As a separate and distinct affirmative defense, the actions of this answering Defendant in all respects were reasonable, proper, and legal.

**TWENTY-FIFTH AFFIRMATIVE DEFENSE**

As a separate and distinct affirmative defense, this answering Defendant alleges the force used, as alleged in Plaintiff's Complaint, was caused and necessitated by Plaintiff's actions, and were reasonable and necessary for self-defense.

**TWENTY-SIXTH AFFIRMATIVE DEFENSE**

As a separate and distinct affirmative defense, this answering Defendant is protected from liability under the doctrine of absolute immunity.

**TWENTY-SEVENTH AFFIRMATIVE DEFENSE**

As a separate and distinct affirmative defense, this answering Defendant alleges it is not liable to Plaintiff for the claimed damages or injuries as alleged in her Complaint, because Plaintiff assumed the risk of those damages and/or injuries.

**TWENTY-EIGHTH AFFIRMATIVE DEFENSE**

As a separate and distinct affirmative defense, this answering Defendant assert it not liable for damages imposed primarily for the sake of example and by way of punishing this Defendant.

**THIRTIETH AFFIRMATIVE DEFENSE**

As a separate and distinct affirmative defense, this answering Defendant alleges

1 the conduct alleged in Plaintiff's Complaint did not violate an interest cognizable  
2 under 42 U.S.C., section 1983.

3 **THIRTY-FIRST AFFIRMATIVE DEFENSE**

4 As a separate and distinct affirmative defense, this answering Defendant alleges  
5 Plaintiff's claims are barred by the doctrine of offset.

6 **THIRTY-SECOND AFFIRMATIVE DEFENSE**

7 As a separate and distinct affirmative defense, this answering Defendant alleges  
8 it is immune from any claim for relief, as alleged in Plaintiff's Complaint, pursuant  
9 to California Code of Civil Procedure, section 262.1.

10 **THIRTY-THIRD AFFIRMATIVE DEFENSE**

11 As a separate and distinct affirmative defense, this answering Defendant alleges  
12 it cannot be liable as any and all force used, as alleged in Plaintiff's Complaint, was  
13 objectively reasonable under the circumstances.

14 **THIRTY-FOURTH AFFIRMATIVE DEFENSE**

15 As a separate and distinct affirmative defense, this answering Defendant alleges  
16 that all Defendants sued in their official capacities are immune from the imposition  
17 of punitive damages.

18 **THIRTY-FIFTH AFFIRMATIVE DEFENSE**

19 As a separate and distinct affirmative defense, this answering Defendant alleges  
20 Plaintiff's claims are barred as they are improperly pled because she fails to name all  
21 parties , contrary to Federal Rule of Civil Procedure 10(a).

22 **THIRTY-SIXTH AFFIRMATIVE DEFENSE**

23 As a separate and distinct affirmative defense, this answering Defendant alleges  
24 Plaintiff's claims for municipal liability are barred as they are improperly pled by  
25 reference to the entire cases, contrary to Federal Rule of Civil Procedure 10(b).

26 **THIRTY-SEVENTH AFFIRMATIVE DEFENSE**

27 As a separate and distinct affirmative defense, this answering Defendant alleges  
28 it is not liable for any injury, whether such injury arises out of an act or omission of

1 the public entity, a public person, or any other person, pursuant to California  
2 Government Code, section 815.

3 **THIRTY-EIGHTH AFFIRMATIVE DEFENSE**

4 As a separate and distinct affirmative defense, this answering Defendant alleges  
5 it is not liable for any alleged failure to discharge any mandatory duty because it  
6 exercised reasonable diligence in the discharge of all duties, as required under  
7 California Government Code, section 815.6.

8 **THIRTY-NINTH AFFIRMATIVE DEFENSE**

9 As a separate and distinct affirmative defense, this answering Defendant alleges  
10 it is not liable by operation of California Government Code, sections 818.2 and 821,  
11 for adopting, failing to adopt, or enforcing any law.

12 **FORTIETH AFFIRMATIVE DEFENSE**

13 As a separate and distinct affirmative defense, this answering Defendant alleges  
14 it is not liable by operation of California Government Code, section 820.6, for injury  
15 caused by acts done in good faith, without malice, and under the apparent authority  
16 of an enactment that is unconstitutional, invalid, or inapplicable.

17 **FORTY-FIRST AFFIRMATIVE DEFENSE**

18 As a separate and distinct affirmative defense, this answering Defendant alleges  
19 its conduct did not cause the constitutional violations alleged in Plaintiff's Complaint.

20 **FORTY-SECOND AFFIRMATIVE DEFENSE**

21 As a separate and distinct affirmative defense, this answering Defendant alleges  
22 that, in the event that they prevail at trial, or by way of dispositive motion, it will be  
23 entitled to recovery of reasonable attorneys' fees and costs under California Code of  
24 Civil Procedure, section 1038 and Title 42 U.S.C., section 1988.

25 **FORTY-THIRD AFFIRMATIVE DEFENSE**

26 As a separate and distinct affirmative defense, this answering Defendant alleges  
27 Plaintiff's claims are barred by Plaintiff's failure to exhaust all administrative  
28 remedies including, all remedies pursuant to 42 U.S.C., section 1977.

**ADDITIONAL AFFIRMATIVE DEFENSES**

This answering Defendant is informed and believe, and thereon allege, it has insufficient knowledge or information on which to form a belief as to whether any additional, unstated affirmative defenses are available. Defendant reserves the right to assert additional affirmative defenses in the event discovery reveals that doing so would be appropriate.

WHEREFORE, Defendant, COUNTY OF LOS ANGELES prays for judgment as follows:

1. That Plaintiff take nothing by way of her First Amended Complaint, and that judgment be entered in favor of Defendants;
2. That the action be dismissed;
3. That answering Defendant recovers costs of suit incurred herein, including reasonable attorneys' fees pursuant to 42 U.S.C. § 1988; and
4. For such other and further relief as the Court deems proper and just.

DATED: October 15, 2024

HURRELL CANTRALL LLP

By: /s/ Blessing O. Ekpezu  
THOMAS C. HURRELL  
BLESSING O. EKPEZU  
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LOS ANGELES

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**DEMAND FOR JURY TRIAL**

Defendant COUNTY OF LOS ANGELES hereby respectfully demands a trial by jury in the above-entitled action. This demand is as to all claims, matters, and issues to which Defendant may legally be entitled to demand a jury.

DATED: October 15, 2024

HURRELL CANTRALL LLP

By: /s/ Blessing O. Ekpezu

THOMAS C. HURRELL

BLESSING O. EKPEZU

Attorneys for Defendant, COUNTY OF  
LOS ANGELES

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